

**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**SANDRA ANNE FARLEY A.K.A.
SANDRA ANNE DE SIMONE A.K.A.
SANDRA ANNE DE SIMONE-SMITH**
P.O. Box 1690
Penn Valley, California 95946

Registered Nurse License No. 575651

Respondent.

Case No. 2007-116

OAH No. 2007020326

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board, as its Decision in this matter.

This Decision shall become effective on JANUARY 7, 2008.

It is so ORDERED December 6, 2007.

LaTranene W Tate

FOR THE BOARD OF REGISTERED NURSING

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 ARTHUR D. TAGGART
Lead Supervising Deputy Attorney General
3 GEOFFREY S. ALLEN, State Bar No. 193338
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4 California Department of Justice
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8 Attorneys for Complainant

9 **BEFORE THE**
10 **BOARD OF REGISTERED NURSING**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

13 **SANDRA ANNE FARLEY A.K.A.**
14 **SANDRA ANNE DE SIMONE A.K.A.**
15 **SANDRA ANNE DE SIMONE-SMITH**
P.O. Box 1690
Penn Valley, California 95946

16 Registered Nurse License No. 575651

17 Respondent.

Case No. 2007-116

OAH No. 2007020326

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
20 above-entitled proceedings that the following matters are true:

21 PARTIES

22 1. Ruth Ann Terry, M.P.H, R.N (Complainant) is the Executive Officer of
23 the Board of Registered Nursing (Board). Complainant brought this action solely in her official
24 capacity and is represented in this matter by Edmund G. Brown Jr., Attorney General of the State
25 of California, by Geoffrey S. Allen, Deputy Attorney General.

26 2. Respondent, Sandra Anne Farley (Respondent), is represented in this
27 proceeding by attorney Edgardo Gonzalez, whose address is 1300 Clay Street, Suite 600,
28 Oakland, California 94612.

3. On or about January 5, 2001, the Board issued Registered Nurse License Number 575651 (License) to Respondent. The license will expire on September 30, 2008, unless renewed.

JURISDICTION

4. Accusation No. 2007-116 (Accusation) was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on November 7, 2006. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of the Accusation is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, discussed with counsel, and fully understands the charges and allegations in the Accusation. Respondent has also carefully read, discussed with counsel, and fully understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in the Accusation.

9. Respondent agrees that her License is subject to discipline and to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

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1 compliance with the Board's Probation Program. Respondent shall inform the Board in writing
2 within no more than 15 days of any address change and shall at all times maintain an active,
3 current license status with the Board, including during any period of suspension.

4 Upon successful completion of probation, Respondent's license shall be fully
5 restored.

6 3. **Report in Person.** Respondent, during the period of probation, shall
7 appear in person at interviews/meetings as directed by the Board or its designated
8 representatives.

9 4. **Residency, Practice, or Licensure Outside of State.** Periods of
10 residency or practice as a registered nurse outside of California shall not apply toward a reduction
11 of this probation time period. Respondent's probation is tolled, if and when she resides outside
12 of California. Respondent must provide written notice to the Board within 15 days of any change
13 of residency or practice outside the state, and within 30 days prior to re-establishing residency or
14 returning to practice in this state.

15 Respondent shall provide a list of all states and territories where she has ever been
16 licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further
17 provide information regarding the status of each license and any changes in such license status
18 during the term of probation. Respondent shall inform the Board if she applies for or obtains a
19 new nursing license during the term of probation.

20 5. **Submit Written Reports.** Respondent, during the period of probation,
21 shall submit or cause to be submitted such written reports/declarations and verification of actions
22 under penalty of perjury, as required by the Board. These reports/declarations shall contain
23 statements relative to Respondent's compliance with all the conditions of the Board's Probation
24 Program. Respondent shall immediately execute all release of information forms as may be
25 required by the Board or its representatives.

26 Respondent shall provide a copy of this Decision to the nursing regulatory agency
27 in every state and territory in which she has a registered nurse license.

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1 6. **Function as a Registered Nurse.** Respondent, during the period of
2 probation, shall engage in the practice of registered nursing in California for a minimum of 24
3 hours per week for 6 consecutive months or as determined by the Board.

4 For purposes of compliance with the section, "engage in the practice of registered
5 nursing" may include, when approved by the Board, volunteer work as a registered nurse, or
6 work in any non-direct patient care position that requires licensure as a registered nurse.

7 The Board may require that advanced practice nurses engage in advanced practice
8 nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the
9 Board.

10 If Respondent has not complied with this condition during the probationary term,
11 and Respondent has presented sufficient documentation of her good faith efforts to comply with
12 this condition, and if no other conditions have been violated, the Board, in its discretion, may
13 grant an extension of Respondent's probation period up to one year without further hearing in
14 order to comply with this condition. During the one year extension, all original conditions of
15 probation shall apply.

16 7. **Employment Approval and Reporting Requirements.** Respondent
17 shall obtain prior approval from the Board before commencing or continuing any employment,
18 paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
19 performance evaluations and other employment related reports as a registered nurse upon request
20 of the Board.

21 Respondent shall provide a copy of this Decision to her employer and immediate
22 supervisors prior to commencement of any nursing or other health care related employment.

23 In addition to the above, Respondent shall notify the Board in writing within
24 seventy-two (72) hours after she obtains any nursing or other health care related employment.
25 Respondent shall notify the Board in writing within seventy-two (72) hours after she is
26 terminated or separated, regardless of cause, from any nursing, or other health care related
27 employment with a full explanation of the circumstances surrounding the termination or
28 separation.

1 8. **Supervision.** Respondent shall obtain prior approval from the Board
2 regarding Respondent's level of supervision and/or collaboration before commencing or
3 continuing any employment as a registered nurse, or education and training that includes patient
4 care.

5 Respondent shall practice only under the direct supervision of a registered nurse
6 in good standing (no current discipline) with the Board of Registered Nursing, unless alternative
7 methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician)
8 are approved.

9 Respondent's level of supervision and/or collaboration may include, but is not
10 limited to the following:

11 (a) Maximum - The individual providing supervision and/or collaboration is
12 present in the patient care area or in any other work setting at all times.

13 (b) Moderate - The individual providing supervision and/or collaboration is in
14 the patient care unit or in any other work setting at least half the hours Respondent works.

15 (c) Minimum - The individual providing supervision and/or collaboration has
16 person-to-person communication with Respondent at least twice during each shift worked.

17 (d) Home Health Care - If Respondent is approved to work in the home health
18 care setting, the individual providing supervision and/or collaboration shall have person-to-
19 person communication with Respondent as required by the Board each work day. Respondent
20 shall maintain telephone or other telecommunication contact with the individual providing
21 supervision and/or collaboration as required by the Board during each work day. The individual
22 providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-
23 site visits to patients' homes visited by Respondent with or without Respondent present.

24 9. **Employment Limitations.** Respondent shall not work for a nurse's
25 registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a
26 traveling nurse, or for an in-house nursing pool.

27 Respondent shall not work for a licensed home health agency as a visiting nurse
28 unless the registered nursing supervision and other protections for home visits have been

1 approved by the Board. Respondent shall not work in any other registered nursing occupation
2 where home visits are required.

3 Respondent shall not work in any health care setting as a supervisor of registered
4 nurses. The Board may additionally restrict Respondent from supervising licensed vocational
5 nurses and/or unlicensed assistive personnel on a case-by-case basis.

6 Respondent shall not work as a faculty member in an approved school of nursing
7 or as an instructor in a Board approved continuing education program.

8 Respondent shall work only on a regularly assigned, identified and predetermined
9 worksite(s) and shall not work in a float capacity.

10 If Respondent is working or intends to work in excess of 40 hours per week, the
11 Board may request documentation to determine whether there should be restrictions on the hours
12 of work.

13 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall
14 enroll and successfully complete a course(s) relevant to the practice of registered nursing no later
15 than six months prior to the end of her probationary term.

16 Respondent shall obtain prior approval from the Board before enrolling in the
17 course(s). Respondent shall submit to the Board the original transcripts or certificates of
18 completion for the above required course(s). The Board shall return the original documents to
19 Respondent after photocopying them for its records.

20 11. **Cost Recovery.** Respondent shall pay to the Board costs associated with
21 its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
22 amount of \$2,000.00. Respondent shall be permitted to pay these costs in a payment plan
23 approved by the Board, with payments to be completed no later than three months prior to the
24 end of the probation term.

25 If Respondent has not complied with this condition during the probationary term,
26 and Respondent has presented sufficient documentation of her good faith efforts to comply with
27 this condition, and if no other conditions have been violated, the Board, in its discretion, may
28 grant an extension of Respondent's probation period up to one year without further hearing in

1 order to comply with this condition. During the one year extension, all original conditions of
2 probation will apply.

3 **12. Violation of Probation.** If Respondent violates the conditions of her
4 probation, the Board after giving Respondent notice and an opportunity to be heard, may set
5 aside the stay order and impose the stayed discipline (revocation) of Respondent's license.

6 If during the period of probation, an accusation or petition to revoke probation has
7 been filed against Respondent's license or the Attorney General's Office has been requested to
8 prepare an accusation or petition to revoke probation against Respondent's license, the
9 probationary period shall automatically be extended and shall not expire until the accusation or
10 petition has been acted upon by the Board.

11 **13. License Surrender.** During Respondent's term of probation, if she ceases
12 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
13 probation, Respondent may surrender her license to the Board. The Board reserves the right to
14 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to
15 take any other action deemed appropriate and reasonable under the circumstances, without
16 further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent
17 will no longer be subject to the conditions of probation.

18 Surrender of Respondent's license shall be considered a disciplinary action and
19 shall become a part of Respondent's license history with the Board. A registered nurse whose
20 license has been surrendered may petition the Board for reinstatement no sooner than the
21 following minimum periods from the effective date of the disciplinary decision:

22 (1) Two years for reinstatement of a license that was surrendered for any
23 reason other than a mental or physical illness; or


24 (2) One year for a license surrendered for a mental or physical illness.

25 **14. Therapy or Counseling Program.** Respondent, at her expense, shall
26 participate in an on-going counseling program until such time as the Board releases her from this
27 requirement and only upon the recommendation of the counselor. Written progress reports from
28 the counselor will be required at various intervals.

ACCEPTANCE


I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Edgardo Gonzalez. I understand the stipulation and the effect it will have on my License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board:

DATED: 8/16/07


SANDRA ANNE FARLEY
Respondent

I have read and fully discussed with Respondent Sandra Anne Farley the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 8/16/07

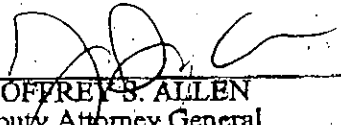

EDGARDO GONZALEZ
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board.

DATED: 8/20/07

EDMUND G. BROWN JR., Attorney General
of the State of California


GEOFFREY B. ALLEN
Deputy Attorney General

Attorneys for Complainant

DOI Matter ID: SA2005103587
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Exhibit A
Accusation No. 2007-116

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Attorneys for Complainant

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 2007-116

SANDRA ANNE FARLEY A.K.A.
SANDRA ANNE DE SIMONE A.K.A.
SANDRA ANNE DE SIMONE-SMITH
P.O. Box 1690
Penn Valley, California 95946

ACCUSATION

Registered Nurse License No. 575651

Respondent.

Ruth Ann Terry, M.P.H., R.N. ("Complainant") alleges:

PARTIES

1. Complainant brings this Accusation solely in her official capacity as the Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer Affairs.

2. On or about January 5, 2001, the Board issued Registered Nurse License Number 575651 ("license") to Sandra Anne De Simone-Smith ("Respondent"). The license will expire on September 30, 2008, unless renewed.

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1 **JURISDICTION**

2 3. Business and Professions Code ("Code") section 2750 provides, in
3 pertinent part, that the Board may discipline any licensee, including a licensee holding a
4 temporary or an inactive license, for any reason provided in Article 3 (commencing with section
5 2750) of the Nursing Practice Act.

6 4. Code section 2764 provides, in pertinent part, that the expiration of a
7 license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding
8 against the licensee or to render a decision imposing discipline on the license. Under Code
9 section 2811(b), the Board may renew an expired license at any time within eight years after the
10 expiration.

11 **STATUTORY AND REGULATORY PROVISIONS**

12 5. Code section 2761(a) states, in pertinent part, that the Board may take
13 disciplinary action against a licensed nurse for unprofessional conduct.

14 6. Code section 2762 states:

15 In addition to other acts constituting unprofessional conduct within the
16 meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct
for a person licensed under this chapter to do any of the following:

17 (a) Obtain or possess in violation of law, or prescribe, or except as
18 directed by a licensed physician and surgeon, dentist, or podiatrist administer to
himself or herself, or furnish or administer to another, any controlled substance as
19 defined in Division 10 (commencing with Section 11000) of the Health and Safety
Code or any dangerous drug or dangerous device as defined in Section 4022.

20

21 (e) Falsify, or make grossly incorrect, grossly inconsistent, or
22 unintelligible entries in any hospital, patient, or other record pertaining to the
substances described in subdivision (a) of this section.

23 7. California Code of Regulations, title 16, section 1443, states, "[a]s used in
24 Section 2761 of the code, 'incompetence' means the lack of possession of or the failure to
25 exercise that degree of learning, skill, care and experience ordinarily possessed and exercised by
26 a competent registered nurse as described in Section 1443.5."

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1 8. California Code of Regulations, title 16, section 1443.5, states,
2 California Code of Regulations, title 16, section 1443.5 states:

3 A registered nurse shall be considered to be competent when he/she
4 consistently demonstrates the ability to transfer scientific knowledge from social,
biological and physical sciences in applying the nursing process, as follows:

5 (1) Formulates a nursing diagnosis through observation of the client's
physical condition and behavior, and through interpretation of information
6 obtained from the client and others, including the health team.

7 (2) Formulates a care plan, in collaboration with the client, which ensures
that direct and indirect nursing care services provide for the client's safety,
8 comfort, hygiene, and protection, and for disease prevention and restorative
measures.

9 (3) Performs skills essential to the kind of nursing action to be taken,
explains the health treatment to the client and family and teaches the client and
family how to care for the client's health needs.

10 (4) Delegates tasks to subordinates based on the legal scopes of practice
of the subordinates and on the preparation and capability needed in the tasks to be
delegated, and effectively supervises nursing care being given by subordinates.

11 (5) Evaluates the effectiveness of the care plan through observation of the
client's physical condition and behavior, signs and symptoms of illness, and
12 reactions to treatment and through communication with the client and health team
members, and modifies the plan as needed.

13 (6) Acts as the client's advocate, as circumstances require, by initiating
action to improve health care or to change decisions or activities which are against
14 the interests or wishes of the client, and by giving the client the opportunity to
make informed decisions about health care before it is provided.

15 COST RECOVERY

16 9. Code section 125.3 provides, in pertinent part, that the Board may request
17 the administrative law judge to direct a licensee found to have committed a violation or
18 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
19 and enforcement of the case.

20 DRUGS

21 10. "Morphine" is a Schedule II controlled substance as designated by Health
22 and Safety Code section 11055(b)(1)(M).

23 11. "Lorazepam" is a Schedule IV controlled substance as designated by
24 Health and Safety Code section 11057(d)(13).

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Falsified, Made Incorrect or Inconsistent Entries In Hospital or Patient Records)**

3 12. Respondent is subject to discipline under Code section 2761(a), on the
4 grounds of unprofessional conduct as defined in Code section 2762(e), in that while employed as
5 a registered nurse at Sierra Nevada Memorial Hospital, Grass Valley, California, Respondent
6 falsified, made grossly incorrect, grossly inconsistent or unintelligible entries in hospital or
7 patient records in the following respects:

8 **APRIL 1, 2002, THROUGH MAY 27, 2002**

9 **Patient 255049:**

10 a. On or about April 1, 2002, at 2003 hours, Respondent signed out 1 mg.
11 Lorazepam for administration, but failed to chart the administration of the medication or
12 otherwise account for the disposition of the medication.

13 b. On or about April 2, 2002, at 0144 hours, Respondent signed out 1 mg.
14 Lorazepam for administration. Respondent charted the administration of this medication at 0100
15 hours, which is 44 minutes prior to signing out the medication.

16 c. On or about April 2, 2002, at 0528 hours, Respondent signed out 1 mg.
17 Lorazepam for administration, but failed to chart the administration of the medication or
18 otherwise account for the disposition of the medication.

19 d. On or about April 3, 2002, at 2245 hours, Respondent signed out 4 mg.
20 Morphine. Respondent charted the administration of 1 mg. at 2230 hours which is 15 minutes
21 prior to signing out the medication. Respondent also failed to account for the disposition of the
22 remaining 3 mg. of medication in any hospital or patient record.

23 e. On or about April 4, 2002, at 0630 hours, Respondent signed out 1 mg.
24 Lorazepam for administration. Respondent charted the administration of this medication at 0615
25 hours, which is 15 minutes prior to the time Respondent signed out the medication.

26 f. On or about April 4, 2002, at 2050 hours, Respondent signed out 4 mg.
27 Morphine and charted the administration of 1 mg at 2030 hours, which is 20 minutes prior to
28 signing out the medication. Respondent also failed to account for the disposition of the

1 remaining 3 mg. of medication in any hospital or patient record.

2 g. On or about April 4, 2002, at 2313 hours, Respondent signed out 4 mg.
3 Morphine and charted the administration of 1 mg. at 2330 hours, but failed to account for the
4 disposition of the remaining 3 mg. of medication in any hospital or patient record.

5 h. On or about April 5, 2002, at 0436 hours, Respondent signed out 1 mg.
6 Lorazepam, but failed to chart the administration of the medication or otherwise account for the
7 disposition of the medication in any hospital or patient record.

8 i. On or about April 5, 2002, at 2300 hours, Respondent charted that she
9 administered 4 mg. of Morphine; however, there was only a record of the withdrawal of 2 mg.
10 of this medication at 2239 hours.

11 j. On or about April 6, 2002, at 0011 hours, Respondent signed out 4 mg.
12 Morphine for administration. Respondent charted the administration of this medication at 0100
13 hours, which is 49 minutes after Respondent signed out the medication.

14 k. On or about April 6, 2002, at 0209 hours, Respondent signed out 4 mg. of
15 Morphine, but failed to chart the administration of the medication or otherwise account for the
16 disposition of the medication in any hospital or patient record.

17 l. On or about April 6, 2002, at 0401 hours, Respondent signed out 4 mg. of
18 Morphine, but failed to chart the administration of the medication or otherwise account for the
19 disposition of the medication in any hospital or patient record.

20 Patient 102278

21 m. On or about April 11, 2002, at 2356 hours, Respondent signed out 1 mg.
22 Lorazepam, but failed to chart the administration of the medication or otherwise account for the
23 disposition of the medication in any hospital or patient record.

24 n. On or about April 15, 2002, at 0623 hours, Respondent signed out 4 mg.
25 Morphine for administration. Respondent charted the administration of this medication at 0600
26 hours, which is 23 minutes prior to the time Respondent signed out the medication.

27 o. On or about April 15, 2002, at 2032 hours, Respondent signed out 1 mg.
28 Lorazepam for administration. Respondent charted the administration of this medication at 2000

1 hours, which is 32 minutes prior to the time Respondent signed out the medication.

2 **Patient 256949:**

3 p. On or about May 22, 2002, at 0630 hours, Respondent signed out 2 mg.
4 Morphine for administration. Respondent charted the administration of this medication at 0600
5 hours, which is 30 minutes prior to the time Respondent signed out the medication.

6 **Patient 192453:**

7 q. On or about May 23, 2002, at 2337 hours, Respondent signed out 0.5 mg.
8 Lorazepam for administration. Respondent charted the administration of this medication at 2300
9 hours, which is 37 minutes prior to the time Respondent signed out the medication.

10 r. On or about May 27, 2002, at 0016 hours, Respondent signed out 2 mg.
11 Morphine, but failed to chart the administration of medication or otherwise account for the
12 disposition of the medication in any hospital or patient record.

13 **JULY 28, 2004**

14 **Patient "E.C.":**

15 s. On or about July 28, 2004, Respondent withdrew and administered 20
16 units of insulin to patient E.C., but charted that she only administered 10 units of insulin on the
17 patient's medication administration record. The physician's order called for the administration of
18 10 units of insulin.

19 **SECOND CAUSE FOR DISCIPLINE**

20 **(Incompetence)**

21 13. Respondent is subject to discipline under Code section 2761(a), on the
22 grounds of unprofessional conduct as defined in Code section 2761(a)(1), in that while employed
23 as a registered nurse at Sierra Nevada Memorial Hospital, Grass Valley, California, Respondent
24 was incompetent in the following respects:

25 a. Between April 1, 2002, and May 27, 2002, Respondent knowingly failed to
26 follow basic hospital policy for medication dispensing, administering and documenting
27 controlled substances, as more particularly set forth above in paragraphs 12.a - 12.r.

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1 b. On or about July 28, 2004, Respondent documented that she administered
2 10 units of insulin to patient E.C., when in fact, she administered 20 units of insulin to patient
3 E.C. The administration of 20 units of insulin is inconsistent with the physician's order, which
4 called for the administration of only 10 units of insulin to patient E.C., as more particularly set
5 forth above in paragraph 12.s.

6 **THIRD CAUSE FOR DISCIPLINE**

7 **(Unprofessional Conduct)**

8 14. Respondent is subject to discipline under Code section 2761(a) in that
9 while employed as a registered nurse at Sierra Nevada Hospital, Grass Valley, California,
10 Respondent engaged in unprofessional conduct, as more particularly set forth above in
11 paragraphs 12 and 13.

12 **PRAYER**

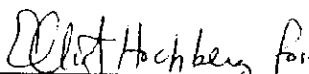
13 **WHEREFORE**, Complainant requests that a hearing be held on the matters
14 herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

15 1. Revoking or suspending Registered Nurse License Number 575651, issued
16 to Sandra Anne De Simone-Smith;

17 2. Ordering Sandra Anne De Simone-Smith to pay the Board of Registered
18 Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Code
19 section 125.3; and,

20 3. Taking such other and further action as deemed necessary and proper.

21 DATED: 10/26/06

22
23 
24 RUTH ANN TERRY, M.P.H., R.N.
25 Executive Officer
26 Board of Registered Nursing
27 Department of Consumer Affairs
28 State of California
Complainant